## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION- DETROIT

In re:	
	Chapter 9
CITY OF DETROIT, MICHIGAN	Case No. 13-53846
	Hon. Steven W. Rhodes
Debtor.	
/	

## JOINDER OF THE CITY OF DETROIT WATER AND SEWERAGE DEPARTMENT TO THE CITY OF DETROIT'S OBJECTION TO MOTION TO [SIC] FOR PERMISSIVE INTERVENTION

NOW COMES the City of Detroit Water & Sewerage Department ("DWSD"), by and through counsel, Kilpatrick & Associates, P.C. and hereby submits this joinder ("Joinder") in the City of Detroit's Objection to Motion to [sic] for Permissive Intervention ("Objection") and in support of this Joinder states as follows:

- 1. DWSD is a department of the City of Detroit that has operational independence from the City in the areas of purchasing, human resources, law, and finance, pursuant to certain orders entered in the case *United States of America v*. *City of Detroit, et. al.*, United States District Court for the Eastern District of Michigan, Case No. 77-71100.
- 2. The relief requested in the Motion to [sic] for Permissive Interventionadjustment of DWSD's rate making ability, implementation of new policies and

procedures related to termination of service, and a moratorium on terminating service to certain customers going forward- would have a direct impact on the operations of DWSD.

3. DWSD hereby joins in the Objection filed by the City of Detroit on August 1, 2014 and adopts and incorporates the arguments in the Objection in their entirety as if fully set forth in this Joinder.

Respectfully Submitted,

KILPATRICK & ASSOCIATES, P.C.

<u>/s/ Richardo I. Kilpatrick</u>

RICHARDO I. KILPATRICK (P35275) SHANNA M. KAMINSKI (P74013) Attorneys for the City of Detroit Water and Sewerage Department and its Board of Water Commissioners 615 Griswold, Ste. 1708 Detroit, MI 48226-3985 ecf@kaalaw.com (313) 963-2581

Dated: August 5, 2014

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## **CERTIFICATE OF SERVICE**

I hereby certify that on August 5, 2014, I electronically filed the Joinder of the City of Detroit Water and Sewerage Department to the City of Detroit's Objection to Motion to [sic] for Permissive Intervention, which sends notice by operation of the Court's electronic filing service to all ECF participants registered to receive notice in this case.

<u>/s/ Shanna M. Kaminski</u> Shanna M. Kaminski (P74013)

Dated: August 5, 2014